

1 Paul R. Kiesel, State Bar No. 119854

kiesel@kiesel.law

2 Mariana McConnell, State Bar No. 273225

mcconnell@kiesel.law

3 Nicole F. DeVanon, State Bar No. 284551

devanon@kiesel.law

4 **KIESEL LAW LLP**

8648 Wilshire Boulevard

5 Beverly Hills, California 90211-2910

Tel: 310-854-4444

6 Fax: 310-854-0812

7 David S. Ratner, State Bar No. 316267

david@ratnermolineaux.com

8 Shelley A. Molineaux, State Bar No. 277884

shelley@ratnermolineaux.com

9 **RATNER MOLINEAUX, LLP**

10 1990 N. California Blvd, Suite 20

Walnut Creek, CA 94596

11 Tel: 925-239-0899

12 Fax: 925-468-2608

13 Attorneys for Plaintiff Robin Watkins, and
14 Plaintiff Adam Sensney on behalf of
themselves and all others similarly situated,

15 **UNITED STATES DISTRICT COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA**

17 ROBIN WATKINS, an individual, and
18 ADAM SENSNEY, an individual, on behalf of
themselves and all others similarly situated,

19 Plaintiff,

20 v.

21
22 MGA ENTERTAINMENT, INC., a California
Corporation,

23 Defendant.
24

Case No.

CLASS ACTION

**DECLARATION OF ROBIN WATKINS
PURSUANT TO CALIFORNIA CIVIL
CODE SECTION 1780(d)**

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28 **DECLARATION OF ROBIN
WATKINS PURSUANT TO
CALIFORNIA CIVIL CODE SECTION
1780(d)**

1 I, ROBIN WATKINS, declare:

2 1. I am a named Plaintiff in this action. The following is based upon my personal
3 knowledge and if called upon as a witness to testify in this matter, I could and would testify
4 competently thereto.

5 2. I make this Declaration pursuant to California Civil Code section 1780(d) so as to
6 state facts showing that this action has been commenced in the proper county for the trial of this
7 action.

8 3. On or about December 4, 2019, my mother purchased a new L.O.L. Surprise! 2-in-1
9 Glamper Fashion Camper, the toy at issue in this action, online through Amazon. The toy was
10 shipped to my home in Walnut Creek, California, and the toy injured my daughter in Walnut Creek,
11 California.

12 4. I am informed and believe, based upon my counsel's investigation into this matter
13 and my own personal experience, that this action has been commenced in the proper judicial district
14 because Defendant at all relevant times has transacted substantial business throughout the Northern
15 District of California, including the sale of the toys that are the subject of this action.

16 I declare under penalty of perjury under the laws of the United States of America that the
17 foregoing is true and correct.

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19 Executed this 24 day of January 2021, at Walnut Creek, California.

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ROBIN WATKINS

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DECLARATION OF ROBIN
WATKINS PURSUANT TO
CALIFORNIA CIVIL CODE SECTION
1780(d)